

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Norfolk-Newport News Division**

<b>TATYANA A. BABAKAEVA,</b>	:	
	:	
<b>Plaintiff,</b>	:	
	:	
<b>v.</b>	:	<b>Civil Action No.: 4:11-cv-78</b>
	:	
<b>ROBERT P. QUADROS, ESQ.</b>	:	
	:	
<b>and</b>	:	
	:	
<b>RAYMOND BACON, ESQ.,</b>	:	
	:	
<b>and</b>	:	
	:	
<b>QUADROS &amp; ASSOCIATES, P.C.,</b>	:	
	:	
<b>Defendants.</b>	:	

**MOTION TO WITHDRAW AS COUNSEL AND SUBSTITUTE COUNSEL**

COMES NOW, Joseph M. Young, Esq. and Rutter Mills, L.L.P., pursuant to Local Rule 7 and Local Rule 83.1 (G) of the Local Rules of the United States District Court for the Eastern District of Virginia, and moves this Court for leave to withdraw as counsel of record for Robert P. Quadros, Raymond Bacon and Quadros & Associates, P.C., and substitute Mary T. Morgan, Esq. and Cooper, Spong & Davis, P.C. as counsel of record, and in support thereof, states as follows:

1. That undersigned currently is listed as counsel for Robert P. Quadros, Raymond Bacon and Quadros & Associates, P.C.

2. That Mary T. Morgan, Esq., an attorney licensed in the Commonwealth of Virginia and admitted to practice before this Court, filed an Appearance of Counsel for Robert P. Quadros, Raymond Bacon and Quadros & Associates, P.C. on October 11, 2011.

3. That pursuant to Local Rule 83.1 (G), reasonable notice has been given to Robert P. Quadros, Raymond Bacon and Quadros & Associates, P.C.

4. That Robert P. Quadros, Raymond Bacon and Quadros & Associates, P.C. have consented to the substitution of Mary T. Morgan, Esq. and Cooper, Spong & Davis, P.C. and have endorsed a proposed Consent Order Granting Substitution of Counsel.

5. No prejudice will befall Robert P. Quadros, Raymond Bacon and Quadros & Associates, P.C. if this Court grants this motion.

6. That a copy of this motion will be served upon Plaintiff at her last known address of 2124 Criston Drive, Newport News, Virginia 23602.

WHEREFORE, Joseph M. Young, Esq, and the law firm of Rutter Mills, L.L.P. respectfully request that this Court permit them to withdraw as counsel for Robert P. Quadros, Raymond Bacon and Quadros & Associates, P.C. and substitute Mary T. Morgan, Esq. and the law firm of Cooper, Spong & Davis, P.C. as counsel of record.

Date: October 19, 2011

\_\_\_\_\_/s/  
Joseph M. Young  
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**CERTIFICATE**

I hereby certify that on the 19th day of October, 2011, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system and will send a true and accurate copy via U.S. Mail, first class, postage pre-paid to the following:

Tatyana A. Babakaeva  
2124 Criston Drive  
Newport News, Virginia 23602  
*Pro se Plaintiff*

\_\_\_\_\_/s/\_\_\_\_\_  
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*Counsel for Defendants Robert P.  
Quadros, Raymond Bacon and  
Quadros & Associates, P.C.*